

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

-----x
In re :
: Chapter 13
:
CHARLES H PREM :
:
:
:
Debtor. : Case No. 24-13445 (AMC)
-----x

ENTRY OF APPEARANCE OF THE CITY OF PHILADELPHIA
COMBINED WITH DEMAND FOR SERVICE OF PAPERS

TO THE CLERK OF THE BANKRUPTCY COURT:

Kindly enter the appearance of PAMELA ELCHERT THURMOND, Esquire as counsel of record for creditor The City of Philadelphia and/or Water Revenue Bureau, where applicable, in the above-captioned matter.

PLEASE TAKE NOTICE that the City of Philadelphia and/or Water Revenue Bureau, (the "City"), a creditor and party-in-interest in the above-captioned case, hereby appears in the above-captioned case by its counsel, Pamela Elchert Thurmond, Senior Attorney; such counsel hereby enters their appearance pursuant to Title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the "Bankruptcy Code") and Fed. R. Bankr. P. 9010 (b), and such counsel hereby requests, pursuant to Fed. R. Bankr. P. 2002, 3017, 9007 and § 342 of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the captioned case and served upon the City and to the attorney at the address and telephone number set forth below.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of Creditor's rights: (1) to have final orders in noncore matters entered only after *de novo* review by a District Judge; (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, setoffs, or recoupments to which Creditor is or may be entitled, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments Creditor expressly reserves.

Respectfully submitted,

THE CITY OF PHILADELPHIA

Dated: March 4, 2025

By: /s/ Pamela Elchert Thurmond
PAMELA ELCHERT THURMOND
Senior Attorney
PA Attorney I.D. 202054
Attorney for the City of Philadelphia
and/or
Water Revenue Bureau
City of Philadelphia Law Department
Municipal Services Building
1401 JFK Boulevard, 5th Floor
Philadelphia, PA 19102-1595
215-686-0508 (phone)
Email: Pamela.Thurmond@phila.gov

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Entry of Appearance of the City of Philadelphia was served by the means designated below, on the date set forth below, upon the following parties:

Via ECF Filing:

Chapter 13 Trustee
Office of the Chapter 13 Standing Trustee
SCOTT F. WATERMAN
2901 St. Lawrence Ave. Suite 100
Reading, PA 19606

United States Trustee
Office of United States Trustee
Robert N.C. Nix Federal Building
900 Market Street – Suite 320
Philadelphia, PA 19107

BRAD J. SADEK
Sadek Law Offices, LLC
1500 JFK Boulevard – Suite 220
Philadelphia, PA 19102

Via USPS Mail Delivery:

Charles H Prem
1471 E. Wilt Street
Philadelphia, PA 19125

Respectfully submitted,

Date: March 4, 2025

By: */s/ Pamela Elchert Thurmond*
PAMELA ELCHERT THURMOND
Senior Attorney
PA Attorney I.D. 202054